

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

AMY SHOEMAKE, )  
Plaintiff, )  
v. ) CIVIL ACTION FILE  
KNAUF FIBERGLASS AND ) NO. 3:05-CV-398-F  
ADECCO EMPLOYMENT SERVICES, )  
Defendants. )

## **REPORT OF THE PARTIES' PLANNING CONFERENCE**

1. **Appearances.** Pursuant to Fed. R. Civ. P. Rule 26(f), a conference was held on July 21, 2005, via telephone among the following:

David R. Arendall for Plaintiff

Richard P. Winegardner for Defendant Knauf Fiberglass

Bradley T. Adler for Defendant Adecco

2. **Pre-Discovery Disclosures.** The parties will exchange by **August 12, 2005**, the information required by Rule 26.

3. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

a. Discovery will be needed on the following subjects:

1. All information pertaining to plaintiff's claims and damages as set forth in the plaintiff's complaint; and
2. All information pertaining to defendants' defenses.

b. All discovery must be commenced in time to be completed by

**June 23, 2006.**

c. There will be a maximum of 30 interrogatories by each party to any other party. The responses must be served 30 days after service.

d. There will be a maximum of 30 requests for admission by each party to any other party. The responses must be served 30 days after service.

e. The parties agree that no more than 10 depositions may be taken by a party without leave of court or agreement of the parties with a maximum time limit of 7 hours per deposition unless extended by the Court.

f. Reports from retained experts under Rule 26(a)(2) will be due from the plaintiff by **October 28, 2005** and from the defendants by **November 28, 2005**.

g. Supplementation of the disclosures under Rule 26(e) should be at appropriate intervals as required by the Federal Rules of Civil of Procedure.

4. **Other Items**

a. **Scheduling Conference:** The parties do not request a conference with the Court before entry of the scheduling order.

b. **Additional Parties, Claims and Defenses:**

The parties must join additional parties and amend the pleadings by **August 30, 2005.**

c. **Dispositive Motions:** All potentially dispositive motions must be filed by **March 23, 2006.**

d. **Settlement:** Settlement and the possibility for mediation cannot be evaluated until some discovery is completed.

e. **Pretrial Conference:** The parties request a final pretrial conference **60** days before trial.

f. **Trial Evidence:** The final list of witnesses and trial evidence under Rule 26(a)(3) should be due **45** days before trial. The parties shall have **15** days after service of the final lists of trial evidence to file objections under Rule 26(a)(3).

g. **PreTrial Hearing:** A pretrial hearing of this case is scheduled for June 23, 2006, at a time and specific location to be determined later in the United States Courthouse, Opelika, Alabama. This conference shall be attended by

at least one of the attorneys who will try the case for each of the parties and by any party not represented by an attorney. The court will address the matters provided for in Rule 16(c). All motions which have not been submitted or ruled on will be heard at this time.

h. **Trial Date:** The case should be ready for trial by **July 24, 2006** and is expected to take approximately **3** days of trial time.

Dated: July 21, 2005

**[SIGNATURES ON FOLLOWING PAGE]**

**SUBMITTED BY:**

/s/ David R. Arendall

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